

Attachment A

Affidavit of Task Force Officer Ashley Robertson

Your affiant Ashley Robertson, being duly sworn, deposes and states as follows:

1. I have been with the Jackson Police Department for 16 years. I am currently a Task Force Officer with the ATF. I am also an Investigator with the Jackson Police Department (JPD) Gang Enforcement Team and have attended numerous schools/trainings pertaining to gangs and narcotics and firearms. I have participated in investigations of Racketeer Influenced and Corrupt Organizations (RICO), Violent Crimes in Aid of Racketeering (VICAR) and other violent crimes, drug conspiracies, and federal firearms investigations. I have conducted or participated in surveillances related to gang activity, the execution of search warrants at gang members' homes, debriefings of gang informants, gang members, and co-conspirators, review of social media posts by gang members, listening to jail calls of gang members, viewing tattoos of gang members, reading gang literature and by-laws. Through my training education and experience, I have become familiar with the operation of illegal drug trafficking organizations, RICO and VICAR, criminal street gangs and the methods they use to import and distribute narcotics, to plan and carry out acts of violence, and to purchase, acquire and retain firearms

2. On June 1, 2020, Jackson Police Department began an investigation of Justin COFFMAN because COFFMAN was posting photographs to his Facebook page and another page titled, "The Gunpowder Plot" that depicted him holding a Molotov cocktail near Jackson City Court building. The photo also showed a Jackson Police Department transport van. Above the photo there was a quote, "You will bathe in the flames born from your hatred." COFFMAN was also seen at two protests against police violence in the day leading up to the investigation. Officers obtained a state search warrant for the potential incendiary device and located two firearms in the

bedroom of COFFMAN, a Spikes Tactical, model ST15, multi caliber AR type rifle and a Sarsilmaz, model SARK2P 9mm pistol. COFFMAN stated after being Mirandized that he lawfully purchased the firearms and they were his. COFFMAN also admitted to smoking 1-2 grams of marijuana per day and approximately 24 grams of suspected marijuana were recovered as part of the search warrant. Marijuana meets the definition of a controlled substance pursuant to 21 U.S.C. § 802.

3. Your affiant spoke with SA Wes Stilwell of the ATF and SA Stilwell stated that firearms recovered from COFFMAN's bedroom were not manufactured in Tennessee, therefore, they traveled in interstate commerce. SA Stilwell is a Firearm Interstate Nexus Agent.

And further, Affiant saith not.

Pursuant to Federal Rule of Criminal Procedure 4.1(a), the undersigned judicial officer has on this date considered information communicated by ☒ telephone or [] other reliable electronic means or [] both, in reviewing and deciding whether to issue a criminal complaint. In doing so, this judicial officer has placed the affiant under oath and has confirmed by speaking personally with the affiant on the telephone [] that the signatures on the criminal complaint and affidavit are those of the affiant or ☒ that the affiant has authorized the placement of the affiant's signatures on the criminal complaint and affidavit, the documents received by the judicial officer are a correct and complete copy of the documents submitted by the affiant, and the information contained in the criminal complaint and affidavit are true and correct to the best of the affiant's knowledge.


Ashley Robertson, Task Force Officer, ATF

Sworn to and subscribed before me by telephone this 10 day of September, 2020.

s/Jon A. York

Honorable Jon A. York
United States Magistrate Judge